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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION

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12 Case No.: 3:18-cv-04865-EMC
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15 IN RE TESLA, INC. SECURITIES
LITIGATION
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STIPULATION AND ~~PROPOSED~~
ORDER ADJUSTING SCHEDULE
FOR RESPONDING TO
CONSOLIDATED COMPLAINT
AS MODIFIED
(Civil L.R. 6-1(b))

Judge: The Honorable Edward M. Chen

Date Action Filed: August 10, 2018

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STIP. AND ~~PROPOSED~~ ORDER
ADJUSTING SCHEDULE FOR RESPONDING
TO CONSOLIDATED COMPLAINT

Case No.: 3:18-CV-04865-EMC

1 WHEREAS, on November 27, 2018, the Court issued an Order (1) consolidating nine
 2 proposed class actions, each alleging violations of the federal securities laws against defendants
 3 Tesla, Inc. and Elon Musk (collectively, "Defendants"); and (2) granting Plaintiff Glen Littleton's
 4 ("Lead Plaintiff") motion for appointment as Lead Plaintiff and approving Littleton's selection of
 5 Levi & Korsinsky, LLP as Lead Counsel;

6 WHEREAS, pursuant to stipulation, on January 4, 2019, the Court issued an Order setting
 7 the following schedule for responding to Lead Plaintiff's anticipated consolidated complaint:
 8 March 7, 2019 to move to dismiss; April 26, 2019 to oppose; and May 31, 2019 for any reply;

9 WHEREAS, on January 16, 2019, Lead Plaintiff filed his Consolidated Complaint;

10 WHEREAS, the Consolidated Complaint named seven additional defendants;

11 WHEREAS, in light of the inclusion of additional defendants who were not parties at the
 12 time of the originally stipulated schedule, counsel for the parties have met and conferred and
 13 agreed to adjust the schedule for responding to the Consolidated Complaint (and associated
 14 briefing) by three weeks, which adjustment does not disturb any other date set by the Court;

15 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, subject to the
 16 approval of the Court, that:

- 17 1. Any motion to dismiss or otherwise respond to Lead Plaintiff's Consolidated
 Complaint shall be filed on or before March 28, 2019;
- 18 2. Lead Plaintiff's opposition thereto shall be filed on or before ~~May 17, 2019~~^{April 25, 2019}; and
- 19 3. Any reply shall be filed on or before ~~June 21, 2019~~^{May 16, 2019}.
- 20 4. Hearing set on June 13, 2019 at 1:30 p.m., courtroom 5, 17th floor, San Francisco.

21 Dated: February 8, 2019

FENWICK & WEST LLP

22 By: /s/ Jennifer C. Bretan
 23 Jennifer C. Bretan

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 26 Telephone: (415) 875-2300
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28 Attorneys for Defendants Tesla, Inc. and Elon Musk

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1 Dated: February 8, 2019

LEVI & KORSINSKY, LLP

2 By: /s/ Nicholas I. Porritt

3 Nicholas I. Porritt (admitted *pro hac vice*)

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5 Washington, D.C. 20007

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7 Facsimile: (202) 337-1567

8 Attorneys Lead Plaintiff Glen Littleton and Lead
9 Counsel for the Class

10 Pursuant to Local Rule No. 5-1(i)(3), all signatories concur in filing this stipulation.

11 Dated: February 8, 2019

12 By: /s/ Jennifer C. Bretan

13 Jennifer C. Bretan

14 ***

15 **[PROPOSED] ORDER**

16 PURSUANT TO STIPULATION, IT IS SO ORDERED



17 Hon. Edward M. Chen
18 United States District Court Judge

19 Dated: February 11, 2019

FENWICK & WEST LLP
ATTORNEYS AT LAW
SAN FRANCISCO